

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**FEDERAL RESERVE BANK OF SAN  
FRANCISCO,**

Plaintiff

v.

**OTO ANALYTICS, LLC; BENWORTH  
CAPITAL PARTNERS PR, LLC;  
BENWORTH CAPITAL PARTNERS, LLC;  
BERNARDO NAVARRO and CLAUDIA  
NAVARRO,**

Defendants.

Civil No. 23-01034 (GMM) *cons.*

Civil No. 24-01313 (GMM)

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO COMPLY WITH THE COURT’S DISCOVERY ORDER [DE 245]**

**TO THE HONORABLE COURT:**

**COME NOW** defendants Benworth Capital Partners PR, LLC (“Benworth PR”), Benworth Capital Partners, LLC (“Benworth FL”), and Bernardo and Claudia Navarro (“Mr. and Mrs. Navarro” and, jointly with Benworth PR and Benworth FL, the “Defendants”), through the undersigned counsel and pursuant to Local Rule 16(h)(i)(1), and respectfully request that the Court extend the deadline for Defendants to comply with the Court’s Order on Plaintiff’s *Motion to Enforce Order at ECF No. 224 Granting Plaintiff-Intervenor Federal Reserve Bank of San Francisco’s Motion to Compel Benworth’s Quickbooks Accounting Data* (the “Order”):

1. On May 21, 2025, the Court entered the Order, ordering Defendants to provide Plaintiff-Intervenor the Federal Reserve Bank of San Francisco (the “Reserve Bank”) with exported data from their QuickBooks database for the period of January 1, 2020, to the present, by May 27, 2025. (*See* D.E. 245).

**Unopposed Motion for Extension of Time to Comply with the Court's Discovery Order (D.E. 245)**

Civil No. 23-01034 (GMM) *cons.* 23-01313 (GMM)

Page 2 of 3

---

2. Due to technical issues out of their control, Defendants have not had access to their servers, including the QuickBooks database, since May 18, 2025. Defendants immediately engaged an IT firm to restore access, but the IT firm has stated that it will need another two weeks to fully restore the servers.

3. Accordingly, Defendants respectfully request a 2-week extension, through June 10, 2025, to fully comply with the Court's Order.

4. Counsel for Defendants initially raised the need for extension with counsel for the Reserve Bank via email on May 23, 2025. Counsel for the parties conferred further via phone and email on May 27, 2025. Counsel for the Reserve Bank represented that it will not oppose the extension requested herein if Defendants agree to two conditions: (1) that Defendants attach to this Motion a declaration, under penalty of perjury, by an individual at Benworth FL with personal knowledge of the issue necessitating the extension that describes the issue and how it prevents access to the QuickBooks data, and (2) to note on this Motion that, although Defendants are seeking a two-week extension, Defendants agree to produce the data at the earliest possible date, as soon as it is available.

5. Defendants agree to both conditions. But due to the nature of the issue necessitating the extension, Defendants are unable to submit the declaration requested by the Reserve Bank with the instant Motion. However, Defendants will file the requested declaration no later than tomorrow, May 28, 2025, to which the Reserve Bank expressed no objection.

6. This motion is made in good faith to ensure compliance with the Court's Order and based on circumstances out of the Defendants' control, and not for purposes of delaying the proceedings. Granting this motion will not prejudice any party.

**WHEREFORE**, Defendants respectfully request that the Court grant this unopposed

**Unopposed Motion for Extension of Time to Comply with the Court's Discovery Order (D.E. 245)**

Civil No. 23-01034 (GMM) *cons.* 23-01313 (GMM)

Page 3 of 4

---

motion and extend the deadline to comply with the Court's Order at D.E. 245 to June 10, 2025.

**CERTIFICATE OF SERVICE:** We hereby certify that on this same date the foregoing reply was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys and participants of record.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on May 27, 2025.

**Ferraiuoli**

PO Box 195168  
San Juan, PR 00919-5168  
Tel.: 787.766.7000  
Fax: 787.766.7001

s/ Roberto A. Cámara-Fuertes  
USDC-PR 219002  
[rcamara@ferraiuoli.com](mailto:rcamara@ferraiuoli.com)

s/ Jaime A. Torrens-Dávila  
USDC-PR 223810  
[jtorrens@ferraiuoli.com](mailto:jtorrens@ferraiuoli.com)

s/ Mónica Ramos Benítez  
USDC-PR 308405  
[mramos@ferraiuoli.com](mailto:mramos@ferraiuoli.com)

**KOZYAK TROPIN & THROCKMORTON**  
2525 Ponce de Leon Blvd., 9th Fl.  
Miami, FL 33134  
(305) 372-1800

Jorge L. Piedra (admitted *pro hac vice*)  
[jpiedra@kttlaw.com](mailto:jpiedra@kttlaw.com)  
Michael R. Lorigas (admitted *pro hac vice*)  
[mlorigas@kttlaw.com](mailto:mlorigas@kttlaw.com)  
Rasheed K. Nader (admitted *pro hac vice*)  
[rnader@kttlaw.com](mailto:rnader@kttlaw.com)

*Counsel for Benworth Capital Partners LLC and Bernardo Navarro*

**Unopposed Motion for Extension of Time to Comply with the Court's Discovery Order (D.E. 245)**

Civil No. 23-01034 (GMM) *cons.* 23-01313 (GMM)

Page 4 of 4

---

**CASELLAS ALCOVER & BURGOS PSC**

PO Box 364924

San Juan, PR 00936-4924

Tel. (787) 756-1400

Fax. (787) 756-1401

[rcasellas@cabprlaw.com](mailto:rcasellas@cabprlaw.com)

[cloubriel@cabprlaw.com](mailto:cloubriel@cabprlaw.com)

/s/ Carla S. Loubriel Carrión

USDC-PR Bar No. 227509

Ricardo F. Casellas

USDC-PR Bar No. 203114

*Counsel for Benworth Capital Partners PR LLC and Claudia Navarro*